



# **Sustainable Compliance:**

## **Fostering Partnerships and Dialogues with Regulatory Agencies**

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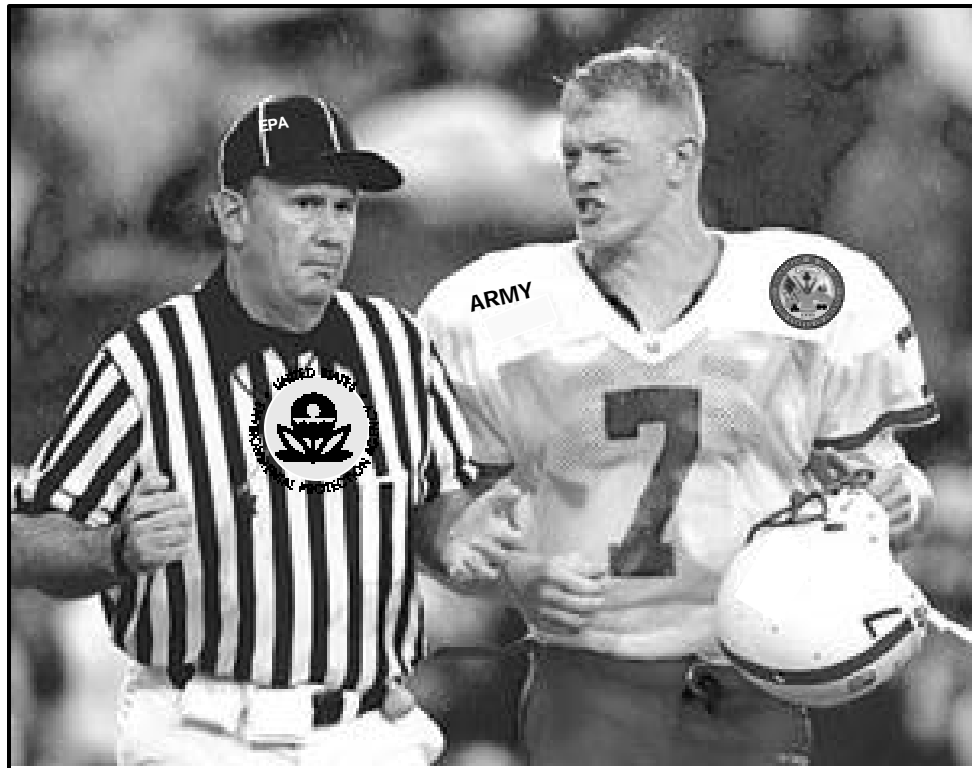
Army Worldwide Environmental and Energy Conference, December 6, 2000

# What Moved Army to Partner?

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## Misconceptions

**Regulator  
Point of View**



**Army Point  
of View**

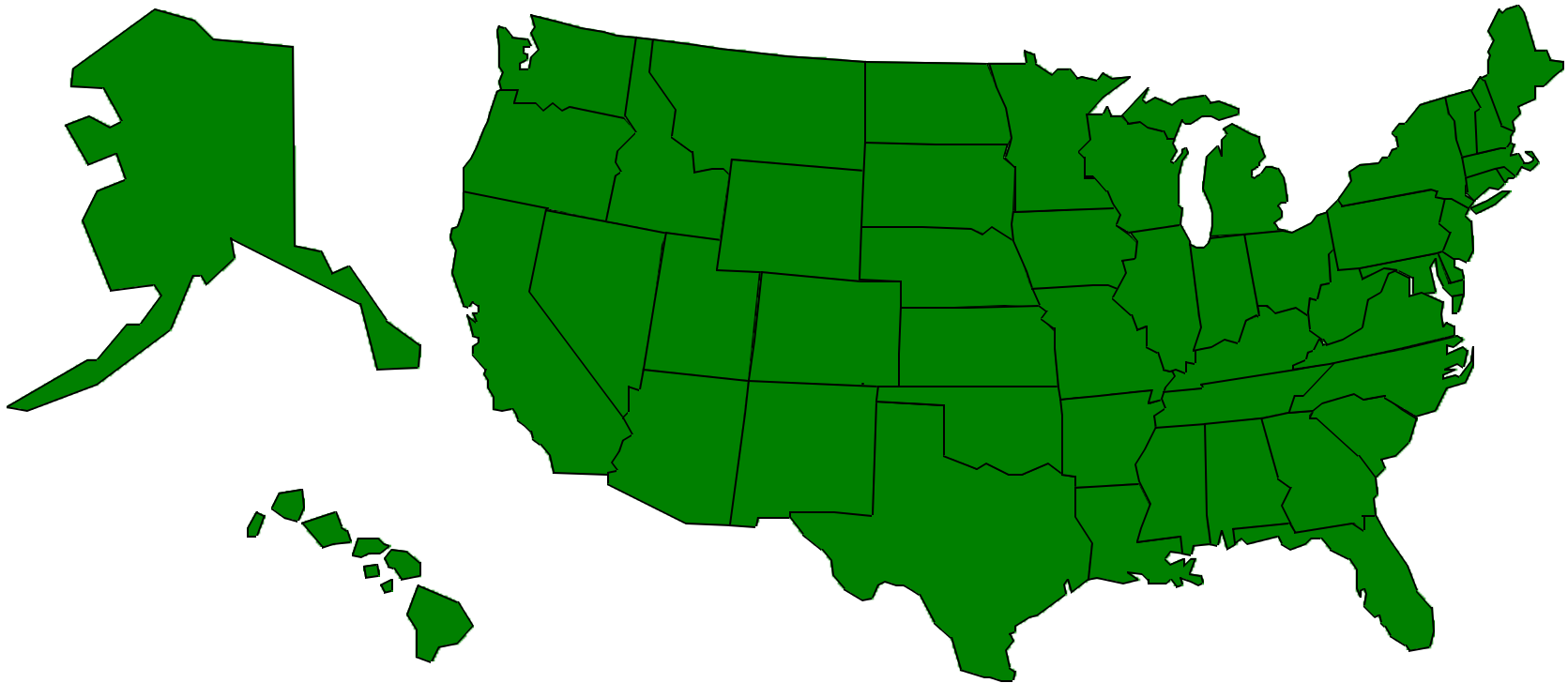
# What Moved Army to Partner? (continued)

- + NOVs, Fines/Penalties, Past Posturing
- + Communication only via Official Letters
- + Little Progress on Cleanup Programs
- + Slow Permitting
- + Potential for Adversarial Relationships between Military/Regulators rather than Professional Differences
- + Escalating Compliance Requirements



# Example Partnerships

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# Texas Pollution Prevention Partnering Group (TXP3)

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## + Functions

- Develop collaborative processes that promote P2
- Reduce institutional barriers to P2
- Facilitate long-term strategies to incorporate P2 into the organizational culture

## + Members

- EPA Region VI
- Military Installations
- Service Regional Environmental Coordinators
- NASA
- TNRCC



# TXP3 (continued)

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## **Results**

- Influence policy and resolve common problems
- Exchange of lessons learned
- Website established: <http://www.afcee.brooks.af.mil/txp3>
- “Green Base” Initiative
- State P2 Crossfeed Initiative





# **Alaska Statement of Cooperation**

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## **Functions**

- **Model Tier II Partnering Agreement – 7 years**
- **Addresses all Federal environmental issues statewide**

## **Members**

- **EPA X Regional Administrator**
- **Alaska Department of Environmental Conservation**
- **Flag Officers – all services**
- **Executives of Civilian Federal Agencies**

## **Results**

- **Interagency Pollution Prevention Partnership**
- **Annual Alaska Forum on the Environment**
- **Joint Regional Environmental Training Center**





# Hawaii Environmental Forum

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## **Functions**

- Newly developing Tier II Partnering Agreement
- State/Military Environmental Communication

## **Members**

- Hawaii Department of Health (Environmental)
- Hawaii Department of Land & Natural Resources
- Hawaii Office of Environmental Quality & Control
- Multi Service Installation Environmental Managers

## **Results**

- Multi Service Hawaii Environmental Managers Partnership
- Hawaii Pollution Prevention Partnership





# **Regions VI & VII Military Environmental Groups**

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## **+ Functions**

- Promote partnering
- Address issues in all four pillars of DoD's Environmental Program
- Share lessons learned by installations and trade ideas
- Showcase host installation's environmental program

## **+ Members**

- Military commands, installations and USACE districts
- Service and DLA Regional Environmental Coordinators (RECs)
- State environmental regulatory agencies
- EPA Regions

## **+ Results**

- EPA Compliance Assistance Workshops for federal facilities
- DoD Breakout incorporated in EPA RVII's Federal Facilities Conference
- Dialogue and coordination between Army REC and FFC regularly

# Southwest Strategy Initiative

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## + Functions

- Federal agencies collaborating in Arizona & New Mexico
- Addresses cultural, economic, environmental and quality of life issues
- Regional Executive Council meets monthly
- Focused Workgroups address specific issues

## + Members

- DoA, DoI, DoD, EPA, State and Tribal representatives

## + Results

- Forum for dialogue with other Federal, state, and tribal entities
- Improved information flow between agencies on critical issues
- Water, rangeland management, endangered species, tribal issues
- Improved coordination between DoD and component RECs

# Region IV Tiered Partnering Restoration

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## + **Functions**

- Collaborative decision making for restoration issues
- Share lessons learned and new information
- Reward success and publicize results

## + **Members**

- Military installations
- Major commands
- 4 Service Regional Environmental Coordinators (RECs)
- 7 states
- EPA Region IV
- Corps of Engineers



# Region IV Tiered Partnering Restoration (continued)

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## + Results

- Better teamwork for quicker, cheaper, faster cleanup
- Shortened review times for documents
- Built trust among partners
- One of the first Land Use Control Policies
- Practical actions that lead to real results
- Win/win scenarios

***Better! Cheaper! Faster!***

# Region IV/State Pollution Prevention Partnership

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## + **Functions**

- Promote new pollution prevention initiatives
- Better understand regulatory requirements and influence when appropriate to minimize unintended/unacceptable consequences
- Share information and technology

## + **Members**

- EPA Region IV
- 8 states
- Military installations
- MACOMs
- 4 Service RECs





# Region VI/State Pollution Prevention Partnership (continued)

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## + Results

- Leader involvement
- Small Grants program to address current problems
- Information exchange forums - Technology integration
- Regional contracting mechanisms
- Gateway to sustainability initiatives of MACOMs



# Compliance Partnerships in Region II

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## + **Functions**

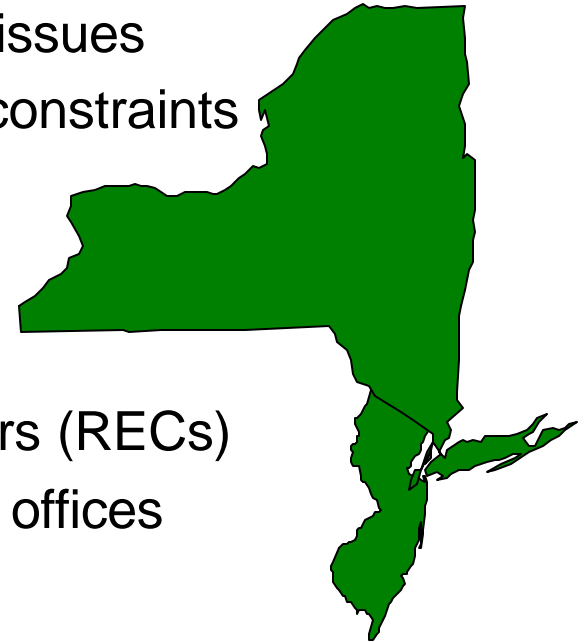
- Mechanism for broad-based, routine communication
- Forum for discussing general and recurrent issues
- Two-way vehicle for briefing programs and constraints

## + **Members**

- Military installations
- ARNG, RSCs, USACE, and DLA
- Service Regional Environmental Coordinators (RECs)
- State regulatory agencies and EPA regional offices

## + **Results**

- Early issue identification
- Greater awareness and less apprehension
- Increased intra- and inter-service synergy



# Restoration Advisory Boards

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## + **Functions**

- Brief community on cleanup programs
- Allow community to provide input
- Address community concerns

## + **Members**

- Community public representatives
- Regulatory agency representatives
- Installation representatives
- Support representatives

## + **Results**

- Team approach on addressing cleanup issues
- Community buy-in of installation plans
- Community representatives are good advocates



# Environmental Council of States

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## + **Functions**

- States collaborating on Environmental issues
- Champion role of states
- Exchange ideas, views and experience among states
- Foster cooperation and coordination
- Articulate state positions to U.S. congress, Federal agencies and public



## + **Members**

- 52 out of 55 states and territories
- Commissioners of states' Environmental programs
- ECOS/DoD Environmental forum, co chairs: Alaska and ODUSD(ES)
- Meet twice a year. Fall meeting is open to DoD POCs.

# Environmental Council of States

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## + Results

- National Environmental Performance Partnership System
- Regulatory Innovative Agreement
- Core performance measures development
- Enforcement evaluation projects
- Resolutions





# Before and After Partnership Comparison

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- + At Ft Jackson between 1993 and 1997, no workplans were reviewed by the State. Partnering initiated March 1997. Received no further action (NFA) for 21 sites; investigations completed at 19 sites; 17 RFI investigations in progress; and ALL WORKPLANS REVIEWED by regulators.
- + Shaw AFB estimated over \$2 million savings as a direct result of the partnering initiative. In addition, document review time was reduced by 210 days per site, and regulators have approved the elimination of some studies that had previously been required.

# Partnership Quotes

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- + “It’s good to bring together the regulators and the military in one place. It helps build better relationships.”--George Carellas, Region IV REO
- + “The Team’s dialogue has been honest and straightforward, with little posturing and positioning. This has brought DoD, EPA, and the State to an understanding of each other’s concerns and needs as rapidly as it could have been done.”--Grover Nicholson, NC DENR
- + “They give me voluminous reports, but during those monthly meetings, I find out what’s important. This really helps me focus my reviews and prioritize my work. It also helps me decide when I need the expertise of other state agencies.”--State RPM
- + “It used to take years to get reports reviewed and approved by the state, now it only takes months, sometimes only weeks.”--Base RPM

# Lessons Learned for Sustainable Compliance

- + **Quality Installation Team**

- Commander Involvement
- Environmental Office Leadership
- Integration - OPS, LOG, Tenets

- + **Know Your Requirements**

- ECAS, EPR, ISR II, SAVs, Inspections, New Regulations, etc.

- + **Good/Professional Relationship with Regulators**

- Partnerships
- Communication, Communication, Communication



# Lessons Learned for Sustainable Compliance (continued)

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- + **Environmental Management Systems**

- E0 13148
- ISO 14001 Pilots

- + **HQ Support**

- + People
- + Money
- + Policy/Guidance
- + EL-RAMP
- + Overhead Protection
- + Lower knee jerk reaction
- + Finances come with tasks



# VISION

## Fort Future

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- + Fort Future is self regulating
- + Missions are not compromised by Environmental impacts
- + Each tenant and activity has internal oversight to ensure their program is in compliance
- + on the EMS not execution
- + EPA and state regulators rarely inspect Installations themselves, they trust the Commanders, Environmental staff and they have faith in Fort Future's EMS
- + Local communities feel safe, trust Installation officials, and are empathetic to Fort Future's mission





# Army REO POCs



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